

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ChipBLASTER, INC., and	)	
GREGORY S. ANTOUN,	)	
	)	
Plaintiffs,	)	Civil Action No.
	)	
vs.	)	04-250 (Erie)
	)	
MIKE KENNEY TOOL, INC.,	)	(Judge McLaughlin)
d/b/a COOLJET SYSTEMS,	)	
	)	THIS DOCUMENT IS BEING
Defendant.	)	FILED ELECTRONICALLY

**PLAINTIFFS' MOTION TO FILE PAPERS UNDER SEAL**

Plaintiffs ChipBLASTER, Inc., and Gregory S. Antoun ("Plaintiffs") hereby move for leave to file certain papers in this action under seal. In support thereof, Plaintiffs state as follows:

1. This is an action for infringement of U.S. Patent No. 5,951,216 ("the '216 patent") entitled "Programmable, Variable Volume and Pressure, Coolant System."
2. A Stipulated Protective Order was enter in this action on May 27, 2005, which governs the production of confidential information in discovery and provided that filings containing confidential information may be made under seal.
3. This Court recently began mandatory electronic filing, under which filing under seal pursuant to Protective Order is no longer permitted. Rather, leave of Court must be sought to file documents under seal.

4. Defendant recently filed a Motion for Reconsideration, or in the Alternative, Clarification of the Court's Decision Denying Defendant's Motion for Summary Judgment. Plaintiff's papers in opposition to this motion include material which has been marked as ATTORNEY EYES ONLY under the terms of the Protective Order previously entered in this case.

WHEREFORE, Plaintiffs respectfully request the Court grant this Motion and permit plaintiffs to file their papers in opposition to Defendant's motion under seal.

Respectfully submitted,

Dated: August 15, 2005

/s/ Stanley D. Ference III

Stanley D. Ference III  
Pa. Bar No. 59899

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**Certificate of Service**

I, Stanley D. Ference III, hereby certify that a copy of the foregoing document is being served  
by Federal Express, prepaid, upon:

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Pittsburgh, Pennsylvania 15222

- and -

Craig A. Gelfound, Esquire  
McDERMOTT, WILL & EMERY  
2049 Century Park East, 34th Floor  
Los Angeles, California 90067

this 15th day of August, 2005.

/s/ Stanley D. Ference III